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9 *Attorneys for Tahoe Regional Planning Agency,
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Novasel*

10 UNITED STATES DISTRICT COURT

11 EASTERN DISTRICT OF CALIFORNIA

12
13 MONICA EISENTECKEN, TAHOE
14 STEWARDS, LLC, TAHOE FOR SAFER
15 TECH, and ENVIRONMENTAL HEALTH
TRUST,

16 Plaintiffs,

17 v.

18 TAHOE REGIONAL PLANNING
19 AGENCY; JOANNE MARCHETTA, in her
official and individual capacities, MARSHA
20 BERKBIGLER in her official and individual
capacities; SUE NOVASEL, in her official
and representative capacities; GUILLIAM
21 NEL; TAHOE PROSPERITY CENTER,
INC.; SACRAMENTO-VALLEY LIMITED
22 PARTNERSHIP dba VERIZON WIRELESS,
and DOES 1-100,

23 Defendants.

24 2:20-cv-02349-TLN-CKD

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28 **STIPULATION AND ORDER TO
EXTEND TIME FOR
DEFENDANTS TO FILE
REPLIES IN SUPPORT OF
THEIR MOTIONS TO DISMISS**

Pursuant to Local Rule 144, Plaintiffs Monica Eisenstecken, Tahoe Stewards, LLC, Tahoe for Safer Tech and Environmental Health Trust, and Defendants Tahoe Regional Planning Agency, Joanne Marchetta, Marsha Berkbigler and Sue Novasel (collectively, the “TRPA Defendants”) and Defendants Guilliam Nel and Sacramento-Valley Limited Partnership dba Verizon Wireless (collectively, the “Verizon Defendants”), through their respective undersigned counsel, stipulate and agree as follows:

On March 3, 2021, the TRPA Defendants filed their Notice of Motion, Motion to Dismiss and Brief in Support of Motion to Dismiss (ECF Nos. 12 and 13), and the Verizon Defendants filed their Notice of Motion and Motion to Dismiss (ECF Nos. 16 and 17). On June 10, 2021, Plaintiffs filed their opposition to the TRPA Defendants’ Motion to Dismiss (ECF No. 34) and their opposition to the Verizon Defendants’ Motion to Dismiss (ECF No. 33). The Court vacated the hearing related to the pending Motions to Dismiss in this case (ECF No. 32). The TRPA Defendants’ Reply in Support of their Motion to Dismiss and the Verizon Defendants’ Reply in Support of their Motion to Dismiss are currently due on June 17, 2021.

The parties stipulate and agree that the due date for TRPA Defendants to file a Reply in Support of their Motion to Dismiss and the Verizon Defendants to file a Reply in Support of their Motion to Dismiss is extended two weeks, to and including July 1, 2021.

This is the first stipulation for extension of time related to the TRPA Defendants’ and Verizon Defendants’ Replies in Support of their Motions to Dismiss. This extension of time is necessary due to Defendants’ counsel facing a number of conflicting deadlines and obligations, as well as the extensive arguments made in ECF Nos. 33 and 34.

Pursuant to Local Rule 144, TRPA Defendants sought this extension from Plaintiffs and the Court by way of this Stipulation and Order as soon as the need became apparent and prior to the filing due date. The parties represent that this stipulation is made in good faith and not for the purpose of delay.

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1 DATED: June 16, 2021

2 LEONARD LAW, PC

3 /s/ Debbie Leonard

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10 *Attorneys for TRPA Defendants*

11 DATED: June 16, 2021

12 MACKENZIE & ALBRITTON LLP

13 /s/ James A. Heard

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16 *Attorneys for Verizon Defendants*

17 **IT IS SO ORDERED.**

18 DATED: June 16, 2021

19 DATED: June 16, 2021

20 LAW OFFICE OF ROBERT J. BERG

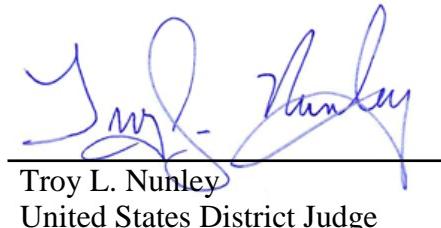
21 /s/ Robert J. Berg

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27

Troy L. Nunley
United States District Judge